

# Bell Works Data Center: Discrepancies and Missing Information for Planning Board Questions

This list identifies significant discrepancies, unresolved conflicts and missing information in the current application record. Residents may use it to prepare questions for the applicant's experts at the Planning Board hearing.

**Scope note:** This review reflects the application package supplied to residents and the Bell Works FAQ as reviewed on August 26, 2026. It identifies conflicts and material gaps that should be reconciled in the public record; it does not assume that any particular adverse consequence will occur.

## Cross-Cutting Record Problems

- **Unreconciled project boundaries:** The Rider describes approximately **12 acres**; the zoning table in the Site Plans identifies an **8.07-acre proposed lot**; the Environmental Impact Report describes an approximately **27-acre project parcel**; and the stormwater analysis uses a **20.81-acre project area**. Each expert should identify exactly which boundary was used in that expert's analysis. *Rider*, PDF p.1; *Site Plans*, PDF p.2; *Environmental Impact Report*, PDF p.4/report p.1; *Stormwater Report*, PDF p.7/report p.6.
- **Deferred documentation:** Proof of outside-agency applications and remaining utility will-serve letters are proposed as conditions of approval rather than pre-vote submissions. *Checklist*, PDF p.9/checklist p.2, ll.30-35; *Rider*, PDF p.2.

### Additional significant issues identified

- **The tract and lot descriptions are also inconsistent.** The Development Application lists the "Area of Tract" as **100.54 acres** and describes subdividing part of Lot 38.07. The Rider title and Traffic Assessment include Lot 38.07 and a portion of Lot 38.05, while the EIR identifies only a portion of Lot 38.07, and the Site Plans create proposed Lot 38.08. The applicant should provide one certified exhibit identifying the approval lot, limits of disturbance, stormwater study area, utility corridors, generator yard and all off-site work. *Development Application*, PDF p.2; *Rider*, PDF p.1; *Traffic Assessment*, PDF p.5/report p.2; *EIR*, PDF p.4/report p.1; *Site Plans*, PDF p.2.
- **The required operating narrative does not disclose the project's core operations.** Checklist item 8 calls for a detailed narrative of the proposed use and operations and is marked complete. The Rider does not identify the eventual operator or tenant, the committed type or end use of the data center, the cooling equipment, the electrical-service configuration, generator ratings and fuel storage, or the operating ramp to 40 MW. The applicant should identify the document that satisfied checklist item 8. *Checklist*, PDF p.8/checklist p.1, item 8; *Rider*, PDF p.1.
- **The FAQ and application disagree on the number of buildings to be removed.** The FAQ says the project will replace "an existing structure," while the EIR and Stormwater Report state that **two existing buildings** will be demolished. *Bell Works FAQ*, "What's actually being proposed"; *EIR*, PDF p.4/report p.1; *Stormwater Report*, PDF p.4/report p.3.
- **The EIR's woodland acreage cannot be reconciled with its stated 27-acre project parcel without a different denominator.** The EIR calls the proposed parcel approximately 27 acres, but later says the "entire project site" contains **52.52 acres of woodland**. The applicant should identify the exact tract used for every woodland percentage and mitigation calculation. *EIR*, PDF p.4/report p.1 and PDF p.8/report p.5.
- **Tree-removal totals conflict.** The EIR says 46 trees will be removed and 185 will remain; the Woodland Retention and Preservation Plan says 47 will be removed and 184 will remain. *EIR*, PDF p.8/report p.5; *Site Plans*, PDF p.32, Sheet LD100.
- **The site-review consent form names the wrong municipality.** The application's consent clause authorizes inspection by the "Township of Howell's" boards and personnel rather than Holmdel. The applicant should explain whether a corrected consent and application form will be filed. *Development Application*, PDF pp.3-5.

## 1. Electricity

### Discrepancies and inconsistencies

- The FAQ says JCP&L confirmed sufficient existing capacity, no new poles, only wire replacement and no reliability impact. JCP&L's filed letter does **not** confirm 40-MW availability. It says the exact service method remains undetermined, the applicant must still apply, and a substation, upgrades, additional equipment, easements and payment may be required. *JCP&L Letter*, p.1, ll.9-18 and 35-44.

- The FAQ's claims of approximately **48 MW of historic allocation** and approximately **5 MW of current use** are not supported by documents in the submitted application.
- The plans identify **26 MW of critical load** and **40 MW of total utility load**, but do not explain the operating load profile or how quickly the facility will reach full load. *Architectural Plans*, PDF p.1, "Building" callout.

#### Key missing information

- A written JCP&L commitment to provide 40 MW.
- Capacity or facilities studies; point of delivery; service voltage; feeder configuration; redundancy; substation location and dimensions; off-site improvements; easements; and construction route.
- The analysis supporting the FAQ's no-reliability-impact claim.
- Who pays for each improvement and whether any Township land, easement or infrastructure is required.
- Whether material electrical changes must return to the Board at a new public hearing.

#### | Additional significant issue identified

- The architectural master plan labels an existing electrical substation, but no filed electrical plan states whether it will be used, expanded, replaced or supplemented. No electrical one-line diagram, load schedule or load-flow study connects the stated 26-MW critical load to the requested 40-MW utility service. *Architectural Plans*, PDF p.1; *JCP&L Letter*, p.1.

## 2. Water Use and Cooling

#### Discrepancies and inconsistencies

- The FAQ says cooling requires one initial fill and **no additional cooling-water consumption**. The Environmental Impact Report estimates approximately **300 gallons per day for sanitary demand and closed-loop cooling combined**, while separately estimating approximately **300 gallons per day of sewer flow**. The filing does not allocate or reconcile those figures. *EIR*, PDF p.5/report p.2, II.11-15; PDF p.7/report p.4, II.32-35.
- The EIR concludes there will be no adverse water-supply impact based on an anticipated utility approval, while acknowledging that the formal water will-serve letter is unavailable.

#### Key missing information

- Final mechanical cooling design, equipment schedule and manufacturer specifications.
- Heat-rejection calculations for the 26-MW critical load.
- Initial fill volume; coolant type; recurring makeup water; leakage; maintenance draining and refilling; humidification; and emergency operating water.
- Confirmation whether evaporative or adiabatic cooling is prohibited under all conditions.
- A complete water balance showing incoming water, sanitary discharge, cooling use and other site uses.
- Final water, sewer-capacity and fire-flow confirmations; metering and enforceable water limits.

#### | Additional significant missing information

- The submitted roof plan identifies no cooling equipment, and the package contains no detailed mechanical or MEP cooling plan tying the "closed-loop" description to actual equipment, capacity or location. *Architectural Plans*, PDF pp.1 and 6.
- The application does not identify the cooling-fluid chemistry and volume, leak-detection system, secondary containment, treatment chemicals or disposal procedure for drained coolant.

## 3. Noise

#### Discrepancies and inconsistencies

- The FAQ promises compliance with daytime and nighttime limits, but the application includes no completed-facility acoustic study.
- The EIR identifies single-family residences north and east of the site, but later says, "No sensitive receptors are adjacent." *EIR*, PDF p.4/report p.1, II.22-26; PDF p.12/report p.9, II.14-23.
- The EIR evaluates construction noise—not continuous data-center operation.
- The roof plan does not identify cooling equipment, while the elevations show a metal screen extending to approximately 74 feet without identifying the equipment behind it or the screen's acoustic performance. *Architectural Plans*, PDF pp.6-8.

### Key missing information

- Operational acoustic modeling for cooling fans, pumps, transformers, switchgear, UPS equipment and generators.
- Normal nighttime, maximum summer-load, simultaneous-equipment, generator-testing and utility-outage scenarios.
- Manufacturer sound-power data; tonal and low-frequency analysis; receiver locations at nearby homes; and predicted margins below the limits.
- Post-construction testing, complaint procedures and mandatory corrective measures.

### | Additional significant issues identified

- The location of nearby residences is itself inconsistent. The EIR identifies residences to the north and east; the Traffic Assessment identifies a single-family residential community to the west. All of those descriptions undermine the EIR's statement that no sensitive receptors are adjacent. *EIR*, PDF p.4/report p.1 and PDF p.12/report p.9; *Traffic Assessment*, PDF pp.4-5/executive-summary p.i and report p.2.
- No cumulative operational-noise analysis combines the proposed cooling equipment, eight transformers, generators and switchgear with the existing electrical substation and other Bell Works background sources.

## 4. Generator Backup

### Discrepancies and inconsistencies

- Site Plan Sheet CS101 labels **eight generators, eight transformers and two switchgear buildings** in a **22,400-square-foot generator yard**. The Rider describes an approximately **26,340-square-foot generator yard**. *Site Plans*, PDF p.16, Sheet CS101; *Rider*, PDF p.1.
- The architectural GEN YARD depicts six generic equipment footprints, while Site Plan Sheet CS101 identifies eight generators. The applicant should explain whether these drawings show different designs. *Architectural Plans*, PDF p.4; *Site Plans*, PDF p.16.
- The EIR says the generators will use ultra-low-sulfur diesel, but leaves the engine standard unresolved as **Tier 2 or Tier 4**. *EIR*, PDF p.9/report p.6.

### Key missing information

- Manufacturer, model, rating and final number of generators.
- Whether backup covers the **26-MW critical load, the 40-MW utility load or another load**.
- Required continuous runtime in hours or days.
- Fuel consumption per hour; total stored gallons; tank number, location and usable capacity; secondary containment; spill response; and fire-code review.
- Extended-outage refueling plan and the resulting tanker-truck traffic.
- Testing frequency, duration and hours; exhaust-stack details; air-emissions calculations; and generator-noise analysis.

### | Additional significant issues identified

- The EIR says the applicant **will pursue an NJDEP Preconstruction Permit** for the engines, but the EIR's own table of required approvals does not list that air permit. No permit application, engine-by-engine emissions inventory or annual operating-hour calculation is included. *EIR*, PDF p.9/report p.6 and PDF pp.11-12/report pp.8-9.
- Although ULSD fuel is identified, no diesel storage tank, day tank, fuel-transfer piping or containment area is labeled on the submitted Site Plans or Architectural Plans. Sheet CS101 directs the reader to MEP/architectural plans, but the submitted architectural drawings remain conceptual and do not provide those details. *Site Plans*, PDF p.16, Sheet CS101; *Architectural Plans*, PDF pp.4-6.
- The architectural master plan also depicts an existing and proposed natural-gas easement, but the application does not explain the purpose of the gas service or whether it relates to generators, heating or another system. *Architectural Plans*, PDF p.1.
- The EIR refers generally to restrictions on when emergency generators may operate, but states no testing schedule, maximum annual hours, nighttime restriction or extended-emergency exception. *EIR*, PDF p.9/report p.6.

## 5. Groundwater and PFAS

### Discrepancies and inconsistencies

- The stormwater report says the project has **no groundwater-recharge component** because recharge could worsen contamination, but also says the project will **increase annual groundwater recharge** because impervious coverage decreases by 0.86 acre. *Stormwater Report*, PDF p.4/report p.3, ll.29-35; PDF pp.15-16/report pp.14-15.
- The Licensed Site Remediation Professional states that PFAS and other constituents exceed NJDEP groundwater standards, warns that added recharge could expand plumes toward surface waters and interfere with remediation, and recommends that induced artificial recharge not occur. *Stormwater Report*, PDF pp.443-444/Appendix D.
- Three basins have perforated underdrains; Basins 2 and 3 show only one foot between the bottom of the BMP and the seasonal high-water table. *Stormwater Report*, report pp.10-13.
- The EIR reports a 1.03-acre reduction in motor-vehicle surface, while the stormwater report reports a 1.27-acre reduction. *EIR*, PDF p.5/report p.2; *Stormwater Report*, PDF p.7/report p.6.

### Key missing information

- A quantified map showing where additional recharge will occur relative to PFAS plumes, other contaminant plumes and Classification Exception Areas.
- A contaminant-transport analysis or calculation showing whether basin or site infiltration could move the plumes.
- Confirmation whether the basins are impermeably lined and a calculation of expected downward seepage.
- A final LSRP opinion approving the actual submitted basin and grading design.
- Baseline and post-construction monitoring wells, sampling frequency, trigger levels, corrective actions and financial responsibility.

### | Additional significant issues identified

- The Stormwater Maintenance Plan treats the basin bottoms as infiltration areas: it refers to the “basin recharge area” and recommends evaluating the basins’ “infiltration rate.” That language should be reconciled with the Stormwater Report’s statement that the project has no groundwater-recharge component because contamination could be worsened. *Stormwater Maintenance Plan*, PDF p.10/report p.9 and PDF p.19; *Stormwater Report*, PDF p.16/report p.15.
- The main Stormwater Report says the April 2026 geotechnical investigation consisted of **five test pits**, while Appendix F says **six exploratory test pits** were excavated. The applicant should identify which test pits support each basin’s seasonal-high-water-table determination. *Stormwater Report*, PDF p.6/report p.5 and PDF p.465/Appendix F p.2.
- The proposed-watershed narrative identifies two different drainage areas as “Watershed 1B,” one discharging east and one south, while Table 5 uses “Watershed 2C.” The narrative and calculations should be corrected and reconciled. *Stormwater Report*, PDF pp.10-11/report pp.9-10.

## 6. Steep Slopes

### Discrepancies and inconsistencies

- Sheet CA101 identifies **94,154 square feet of slopes over 25 percent** and **9,424 square feet of disturbance**. The exception applies only if the disturbance is necessary for driveways, utilities or drainage and **no better location exists**. *Site Plans*, PDF p.31, Sheet CA101.
- The same sheet expressly excludes disturbance associated with the northwest berm from its calculation.
- The EIR does not prove that no better location exists; it says the chosen locations minimize other impacts and then assumes the reviewing authority and engineer will find the exception applicable. *EIR*, PDF p.10/report p.7, ll.24-34.
- The EIR reports slopes over 25 percent as 8.32 percent of its area, while Sheet CA101 reports 10 percent of its evaluation area. The different boundaries and denominators need explanation.

### Key missing information

- A mapped breakdown of the 9,424 square feet by driveway, utility, drainage and general grading.
- The amount and location of the excluded northwest-berm disturbance.
- Alternative alignments and comparative woodland, wetland, grading and slope impacts.
- Evidence establishing necessity and that no better location exists.
- Slope-stability, erosion and long-term maintenance analysis for each disturbed area.

### | Additional significant issue identified

- The zoning table in the Site Plans reports that no variance or design waiver is required for the greater-than-25-percent slope disturbance. The EIR, however, describes “waiving” the regulation as subject to the reviewing authority’s opinion and bases its no-impact conclusion on the assumption that the authority and engineer will agree. The record should identify the exact legal mechanism and the evidence supporting the required finding. *Site Plans*, PDF p.2; *EIR*, PDF p.10/report p.7.

## 7. Traffic

### Discrepancies and inconsistencies

- The FAQ says the project “will not add traffic,” while the applicant’s traffic report predicts **126 new daily trips**, including 15 morning-peak and 5 evening-peak trips. The report’s conclusion is that the impact will be nominal—not zero. *Traffic Assessment*, PDF p.4/executive-summary p.i and PDF p.10/report p.7.
- The report assumes approximately **20 employees and vendors per day**, with 14 maximum on a shift and light mail/FedEx-type deliveries, but does not break down how those assumptions produce 126 daily vehicle trips.
- The ordinance calculation requires **72 parking spaces**, while only 34 are proposed and a variance is requested. *Traffic Assessment*, PDF p.10/report p.7; *Site Plans*, PDF p.2.

### Key missing information

- Project-specific staffing, shift-change, vendor and delivery assumptions from the actual operator or tenant.
- A breakdown of the 126 daily trips by employee, vendor, package, maintenance and truck trips.
- Construction traffic, electrical-infrastructure construction, large equipment deliveries, diesel deliveries and emergency refueling.
- Truck routes, gate queuing, overlap with Bell Works events and effects on emergency access.
- Existing traffic counts, intersection capacity or level-of-service calculations, crash review and parking contingency if staffing exceeds the estimate.

### | Additional significant issue identified

- The Rider proposes constructing 34 spaces and “land banking” the remaining **38 required spaces**, but the submitted plans do not identify a land-bank location or analyze the grading, tree removal, stormwater and circulation impacts if those spaces must later be built. *Rider*, PDF p.2; *Site Plans*, PDF p.2.

## 8. Visual, Historic and Ecological Review

### Discrepancies and unresolved findings

- The FAQ says the facility will be out of view from surrounding neighborhoods and roadways. The zoning table in the Site Plans reports a building height of approximately **54.8 feet to the roof parapet**, while the architectural elevations show the top of the rooftop metal screen at approximately **74 feet**. The applicant should explain which height controls and why the screen is excluded or included. *Bell Works FAQ*, open-letter “facts”; *Site Plans*, PDF p.2; *Architectural Plans*, PDF pp.7-8.
- The checklist identifies a scenic-resource or sightline analysis as potentially required, but the supplied package contains no leaf-off viewshed analysis or photomontages from nearby homes and public roads. The close-range architectural renderings do not answer that question. *Checklist*, PDF p.11/checklist p.4, item 47; *Architectural Plans*, PDF pp.9-10.
- The EIR states that the site is almost entirely within a historic property and adjacent to historic districts, but says the Phase IA Cultural Resource Report will be submitted later to NJDEP. The EIR nevertheless reaches a no-adverse-impact conclusion before that determination is available. *EIR*, PDF p.9/report p.6.
- The NJDEP Natural Heritage Program response was still pending, and the USFWS list identified the federally threatened Bog Turtle as potentially affected. The EIR nevertheless concludes that the project will have no adverse impact on threatened or endangered species. *EIR*, PDF p.11/report p.8.

### Key missing information

- A leaf-off sightline study showing the 74-foot screen, generator yard, cooling equipment, lighting and any substation improvements from nearby homes and public roadways.
- The completed Phase IA Cultural Resource Report and NJDEP/SHPO determination.
- The NJDEP Natural Heritage Program letter, any required species surveys, and all resulting avoidance or mitigation conditions before the hearing record closes.

## 9. Fire Protection and Emergency Response

### Key missing information

- The plans show fire-water infrastructure and fire-truck circulation, but the application contains no facility-specific fire-protection and emergency-response narrative addressing the data halls, high-voltage equipment, generator yard and stored fuel. *Site Plans*, PDF pp.17 and 26-27.
- The application does not state whether UPS batteries or another energy-storage system will be used. If proposed, the chemistry, quantity, location, ventilation, fire suppression, separation and emergency procedures should be disclosed; if none will be used, the applicant should state that expressly. *Architectural Plans*, PDF pp.4-5.
- Final fire-flow confirmation, fire-department review, hazardous-material inventory, emergency shutdown procedures and responder access to the generator and electrical areas.

## 10. Economic and Municipal-Service Claims

### Discrepancies and missing support

- The FAQ says the project will deliver millions of dollars in recurring tax revenue and place no additional demands on municipal services. The submitted application contains no fiscal-impact analysis, tax or PILOT schedule, projected annual municipal payment, or estimate of additional fire, inspection, emergency-response or infrastructure costs. *Bell Works FAQ*, "What our community stands to gain" and FAQ question 2.

### Key missing information

- Whether the project will pay conventional property taxes, operate under a PILOT or use another arrangement; the projected annual payment and term; the amounts attributable to the Township, schools and county; and all abatements, credits or offsets.
- The assumptions supporting the revenue estimate and an analysis of incremental municipal-service costs. Public-benefit claims should be documented separately and should not substitute for the missing engineering evidence.

## Planning Board Request

The Board should require these materials to be filed, reviewed by Township professionals, made available to residents and supported by qualified testimony **before the record closes**. Any later change involving the electrical service, substation, cooling system, generators, fuel storage or stormwater design should return to the Board if it materially changes the approved plan. The Township checklist expressly allows the Board to request additional information needed to make an informed decision. *Checklist*, PDF p.11/checklist p.4.

**Primary sources reviewed:** Holmdel Development Application and Completeness Checklist; Rider to Planning Board Application; Site Plans dated July 24, 2026; Traffic Assessment dated July 20, 2026; Stormwater Management Report and Stormwater Maintenance Plan dated July 24, 2026; Environmental Impact Report dated July 24, 2026; Architectural Plans dated June 10, 2026; JCP&L letter dated April 7, 2026; and [Bell Works public FAQ](#).